

## **REMARKS**

Applicants have amended claims 1, 4-27, 29, 31-41, 52-53, and 56-61, have canceled claims 2-3, 28, 30, 42, and 50-51, and have added claims 62-65. After the above amendments have been entered, claims 1, 4-27, 29, 31-41, 43-49, and 52-65 will be pending. Based on the above Amendments and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections, and withdraw them.

Claims 1, 16, 21, 24, 25, 41, 47 and 56-61 were rejected under 35 U.S.C. 103(a) as being unpatentable over Sugiyama in view of Ishikawa. The following claims were rejected over Sugiyama and Ishikawa in view of: Wendelken (claims 4-6 and 43-44); Wendelken, Hymel, and Shieh (claims 7 and 45); Chino (claims 8 and 38-40); Shieh (claims 9, 11-12 and 18); Stevens (claim 10); Leman (claims 13-14); Hymel (claims 15, 20, 22, 46 and 48); Dygert (claims 17, 28-29 and 33-35); Shieh, Hymel, and Gerber (claim 19); Shieh, Hymel, and Heilweil (claims 23 and 49); Ohnishi (claim 26 ); Dygert (claims 17, 28-29 and 33-35); Huberman (claim 27); Schroath (claims 31-32); Dygert and Huberman (claim 36); Klatt (claim 37); Mochimaru (claims 52-55).

These rejections are respectfully traversed.

Claim 1 has been amended to recite a printer for printing time-based media comprising:

a printing sub-system within the printer for receiving and printing standard document formats;

an interface within the printer for receiving the time-based media data from a media source, the interface coupled to the printing sub-system;

a multimedia processing system within the printer and coupled to the interface, the multimedia processing system configured for distributing between the multimedia processing system within the printer and a system external to the printer a determination of an electronic representation and a printed representation of the time-based media, wherein the determination is carried out in part by the multimedia processing system within the printer and in part

by the system external to the printer, wherein the multimedia processing system is configured for **controlling operation of the media source, and wherein the controlled operation of the media source is external to the printer;**

a first output device within the printer and in communication with the multimedia processing system to receive the electronic representation, the first output device for producing a corresponding electronic output from the electronic representation of the time-based media; and

a second output device within the printer and in communication with the multimedia processing system to receive the printed representation, the second output device for producing a corresponding printed output from the printed representation of the time-based media.

Claim 41 has also been amended to recite a method for printing time-based media comprising:

receiving and printing standard document formats in response to user input;

receiving the time-based media data from a media source;

automatically determining an electronic representation and a printed representation of the time-based media, wherein the determining is distributed by a media processing system within a printer between the media processing system and a system external to the printer;

**controlling operation of the media source by the multimedia processing system, wherein the controlled operation of the media source is external to the printer;**

generating a corresponding electronic output from the electronic representation of the time-based media; and

generating a corresponding printed output from the printed representation of the time-based media.

Sugiyama and Ishikawa, alone or in combination, fail to recite all of these elements. In particular, neither of these references discloses:

- “a multimedia processing system within the printer and coupled to the interface, the multimedia processing system configured for distributing between the

multimedia processing system within the printer and a system external to the printer a determination of an electronic representation and a printed representation of the time-based media, the determination is carried out in part by the multimedia processing system within the printer and in part by the system external to the printer, wherein the multimedia processing system is configured for **controlling operation of the media source, and wherein the controlled operation of the media source is external to the printer**” (as recited in claim 1)

- “automatically determining an electronic representation and a printed representation of the time-based media, wherein the determining is distributed by a media processing system within a printer between the media processing system and a system external to the printer, wherein the multimedia processing system is configured for **controlling operation of the media source, and wherein the controlled operation of the media source is external to the printer.**” (as in claim 41)

By carrying out some of the processing on the printer and some of the processing external to the printer, the claimed invention distributes the processing load. Further, the ability of the multimedia processing system to control the operation of the media source, wherein the controlled operation of the media source is external to the printer, provides additional utility. For example, as discussed in paragraph 59 of the Application, the printer could communicate with a docked cell phone to automatically bill the owner of the phone through her cell phone provider, or based on information in an XML profile on the phone. In another example, the printer can communicate with a docked cell phone to issue commands to take pictures with the cell phone’s digital camera or to call a number from the cell phone. That data could be transmitted to some other destination by the cell phone when it calls out. The called number could be provided in a profile stored on the cell phone, or it could be stored on the printer.

Sugiyama is directed toward a video printer, while Ishikawa discusses a printing system that contains a dumb printer and parallel processors. Neither reference describes, mentions or suggests a printer or a method that distributes determination of an electronic representation and a printed representation of time-based media by a media processing system within a printer

between the media processing system and a system external to the printer, and wherein the *“multimedia processing system is configured to control operation of the media source, and wherein the controlled operation of the media source is external to the printer.”*

The video printer of Sugiyama does not have the ability to control the operation of a media source. (Sugiyama, Fig. 1). In Sugiyama, the device from which the video signal originates would be a video or still camera. (Sugiyama, col. 3, lines 12-26). There is no disclosure that a media processing system within Sugiyama is configured to control the operation of a media source.

Similarly, the printing system of Ishikawa does not distribute between a multimedia processing system within the printer and a system external to the printer a determination of an electronic representation and a printed representation of the time-based media, wherein the determination is carried out in part by the multimedia processing system within the printer and in part by the system external to the printer, “wherein the multimedia processing system is configured to control operation of the media source, and wherein the controlled operation of the media source is external to the printer.” Ishikawa lacks this element for two reasons: (1) there is no media processing system within the printer of Ishikawa that sends a control signal to an external system and/or controls operation of a media source; and (2) the printer in Ishikawa is simply not capable of processing. It is clear that printer (2) in Fig. 1 lacks processing capabilities. Even Printing Job Division Means (9) cannot solve this problem, as it is located in the First Client Processor (1), not the printer (2). (Ishikawa, Fig. 1). As such, the element of a printer having a multimedia processing system that can send a control signal to an external system and control operation of the media source is not found in the printing system of Ishikawa.

Further, Ishikawa states that the processing can be allocated to a group of parallel processors, but does not describe allocating processing to the printer. (Ishikawa, col. 6, lines 6-44) Rather, the data can only be sent to the printer after the processors process it. (Ishikawa, col. 6, lines 6-44) Ishikawa does not disclose a printer that contains a processor, either to carry out part of the determination of the electronic or printed representation or to control the operation of the media source. *See* printer (2) in Fig. 1.

Therefore, even if Sugiyama and Ishikawa were combined, they would not disclose the elements of the claimed invention, as neither reference discloses distributing between the multimedia processing system and a system external to the printer a determination of an electronic representation and a printed representation of the time-based media, wherein the determination is carried out in part by the multimedia processing system within the printer and in part by the system external to the printer, and wherein *“the multimedia processing system is configured to control operation of the media source, and wherein the controlled operation of the media source is external to the printer.”*

The Examiner recognized on page 12 of the July 11, 2007 office action that “Sugiyama in view of Ishikawa does not disclose expressly that said multimedia processing system is configured to communicate with the media source” in the rejection of claim 29 (prior to amendment). Applicants address the rejection as it applies to claims 1, 41 and 29, as amended.

Dygert discusses a playback device having a text display and communication with a database of titles. (Dygert, Abstract). The device of Dygert, however, does not control “operation of the media source, wherein the controlled operation of the media source is external to the printer”, as recited in claims 1 and 41. Dygert merely obtains textual information within

the database about a desired CD. In addition, claim 29 states that “the multimedia processing system is configured for controlling at least one external functionality of the media source.”

Dygart simply does not disclose that its device controls any external functionality of the media source. Rather, Dygart obtains information stored within the database. As such, Dygart does not disclose the limitations of claims 1, 41 and 29, as amended.

Applicants further submit that the claimed invention, as amended, is not disclosed or rendered obvious by any of the cited references.

In addition, claims 4-27, 29, 31-40, 52, 53, 56-59 and 62-63 recite additional limitations and are dependent on amended claim 1. Claims 43-49, 54-55, 60-61, and 64-65 recite additional limitations and are dependent on amended claim 41.

Particularly regarding claim 27, the Examiner correctly recognizes that Sugiyama in view of Ishikawa and Huberman does not disclose “that the multi-media processing system is configured to generate a web page representation of the multi-media.” The Examiner states that “Huberman discloses generating a web page representation of multimedia data” because for the “page to exist with multi-media data...it is inherent that said web page is generated.” (7/11/07 Office Action at page 19) However, Huberman does not disclose “a multimedia processing system coupled to an interface for receiving the time-based media data” that “generates” a web page; Huberman’s apparatus merely “analyzes collections of linked documents (i.e. Web Pages)” that already exist. (Huberman, col. 3, ln. 30-34) In fact, Huberman provides no disclosure whatsoever in the cited portions of how the web pages are generated. That a web page may have “multi-media content” does not disclose that such a web page was generated by “a multimedia processing system coupled to an interface for receiving the time-based media data.” Thus, none of the listed citations discloses or renders obvious “the multimedia processing system []

configured to generate a web page representation of the multimedia,” as recited by Applicants’ claim 27.

Further, with regard to claim 59, there is no indication that Sugiyama or Ishikawa discloses “the multimedia processing system is configured to control functionality in the system external to the printer system.” Indeed, there is no media processing system within the printer of Ishikawa that sends a control signal to an external system and/or controls operation of a media source; and (2) the printer in Ishikawa is simply not capable of processing. (Ishikawa, col. 6, lines 6-44). The video printer of Sugiyama does not have the ability to send a control signal to the external system of Sugiyama. (Sugiyama, Fig. 1). The Examiner stated that the “external system” in Sugiyama is the device from which the video signal originates, such as a video or still camera. (Sugiyama, col. 3, lines 12-26). There is no disclosure that the camera discussed in Sugiyama can be controlled by a multimedia processing system within the printer.

Claims 62 and 64 state that “the controlled operation by the multimedia processing system comprises controlling the media source to provide data to a system separate from the printer.” The device of Dygert does not control operation of the media source, wherein the controlled operation of the media source is external to the printer, providing data to a system separate from the printer. Dygert merely obtains textual information within the database about a desired CD and provides it to the printer. Dygert does not disclose providing data to a system separate from the printer.

Claims 63 and 65 state that “the controlled operation by the multimedia processing system comprises controlling the media source to capture external data.” The device of Dygert, however, does not control operation of the media source, wherein the controlled operation of the media source is external to the printer, capturing external data. Rather, the data in Dygert

obtained is obtained from the database. Dygert does not disclose controlling the media source to capture external data.

**Conclusion**

Applicants respectfully submit that the claims, as amended, are allowable over the cited references for the reasons described above. Accordingly, Applicants respectfully request allowance of this application. The Examiner is invited to contact the undersigned to advance the prosecution of this application.

Respectfully submitted,  
PETER E. HART, ET AL.

Dated: October 9, 2007

By: Brenda M. Simon/

Brenda M. Simon, Reg. No.: 48,449  
Fenwick & West LLP  
Silicon Valley Center  
801 California Street  
Mountain View, CA 94041  
Tel.: (650) 335-7198  
Fax: (650) 938-5200